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June 30, 2025

**VIA ECF**

The Honorable Lewis J. Liman, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 15C  
New York, NY 10007-1312

**Re: McSweeney v. Cohen et al.; Case No. 24-cv-01503**

Dear Judge Liman:

We are counsel to the Defendants in the above-reference matter. We write pursuant to Rule 1(D) of Your Honor's Individual Practices in Civil Cases.

Defendants request, with the consent of Plaintiff, a brief extension of time to respond to Plaintiff's Motion for Leave to Amend the First Amended Complaint (the "Motion to Amend"), which was filed on May 28, 2025 (ECF No. 100). Defendants have also consented to Plaintiff's request for a corresponding extension of their deadline to reply. The requested revised schedule would be as follows.

- July 16, 2025: Defendants' responsive brief. (The current deadline is July 3, 2025.)
- August 11, 2025: Plaintiff's reply brief. (The current deadline is July 24, 2025.)

No previous requests for adjournment or extension of these dates has been made. Plaintiff consents to this request.

The parties' next scheduled appearance before the Court is a status conference on July 8, 2025, at 10:00 a.m.

The foregoing extension is requested separate and apart from Defendants' simultaneously-filed letter-motion for a stay pending the resolution of their forthcoming motion to compel arbitration. Defendants note that if such stay is granted, it would moot the briefing schedule requested above. Defendants respectfully reserve all rights.

We thank the Court for its attention to this matter.

Respectfully submitted,  
/s/ Jacob D. Albertson

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